

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MIN YU XIAO,

Plaintiff,

- against -

LUCKY CHATHAM REALTY CORP. and  
RICHARD T. WONG,

Defendants.  
-----X

07 Civ. 9430 (RWS) (DFE)

**PROPOSED**

**DISCOVERY PLAN**

**USDC SDNY  
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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2-11-08**

Pursuant to Fed. R. Civ. Pro. 26(f), the parties submit the following proposed discovery plan:

1. The parties participated in a rule 26(f) conference on February 1 and 6, 2008 by telephone.
2. The parties will make initial disclosures on or before February 15, 2008.
3. Discovery Plan. The parties propose the following discovery plan:
  - (a) Service of initial document requests on or before February 6, 2008.
  - (b) Service of initial interrogatories on or before February 6, 2008.
  - (c) Service of deposition notices (parties) on or before February 6, 2008.
  - (d) Deposition of plaintiff to be conducted on or before April 11, 2008.
  - (e) Depositions of defendants to be conducted on or before April 11, 2008.
  - (f) Third party depositions to be conducted on or before June 11, 2008.
  - (g) Additional party interrogatories, if necessary, to be served within thirty days after the completion of third party depositions.
  - (h) Date by which expert witness reports, if any, are to be exchanged: July 11, 2008.

(I) End date for supplementation of discovery responses: pursuant to Rule 26(e).

(j) Discovery which the parties agree will be needed: hours worked by plaintiff, wages paid by defendants, time and pay records maintained by defendants, accommodations furnished by defendants to plaintiff.

(k) Discovery which the parties do not agree is needed:

By Plaintiff: business enterprises related to defendants.

By Defendants: disclosure of tax returns by plaintiff.

(l) The parties anticipate completing discovery no later than August 11, 2008.

4. Other items:

(a) Final date for plaintiff to amend pleadings or to join parties: April 18, 2008.

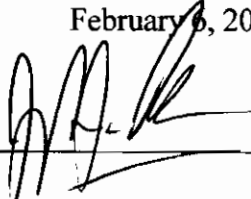
(b) Final date for plaintiff to amend pleadings or to join parties: April 18, 2008.

(c) Final date to file dispositive motions: SEPT. 11, 2008 on PTO

(d) Other than as set forth above, the parties propose no changes or limitations under the local or federal rules.

5. The parties, having been unable to resolve several anticipated discovery issues, propose exploring those issues with the Court at the pretrial conference on February 6, 2008.

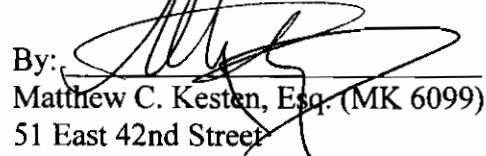
Dated: New York, New York  
February 6, 2008



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Attorneys for Defendants

SO ORDERED:



Robert W. Sweet, U.S.D.J.

February 8, 2008